



**SOUTH
SAN JOAQUIN
IRRIGATION DISTRICT**

01492

JUL 01 1998

June 30, 1998

CALFED-Bay-Delta Program
1416 Ninth Street, Suite 1155
Sacramento, CA 95814
Attn: Mr. Rick Breitenbach

Re: Programmatic EIS/EIR

Gentlemen:

South San Joaquin Irrigation District ("SSJID") has the following comments on the Programmatic EIS/EIR.

SSJID covers approximately 71,112 acres in San Joaquin County. The predominate land use in the District is agricultural, with permanent crops, primarily almonds, comprising more than half of the planted acreage in the District. Urban use totals only 10% of the area in the district. Surface water using the District's Stanislaus River rights is the primary source of water for agriculture in most years; groundwater, primarily from private wells, irrigates the remainder. The District has invested heavily in its surface water delivery systems since the District was formed in 1909. In the late 1980's it significantly modernized its system to use its water supply more efficiently. The District intends to make significant improvements in its surface-water delivery system to better accommodate the needs of drip and sprinkler farmers. These irrigation methods are increasing in use in the District and are currently better served by groundwater. The cities of Manteca, Ripon and Escalon currently rely on groundwater as their sole source of water. The District plans to build a water treatment plant to deliver surface water to Manteca and Escalon, as well as Lathrop and Tracy, which will reduce these cities' reliance on groundwater.

The CALFED alternatives propose significant acquisition of land for both surface water storage and conjunctive use. Some of the proposed projects appear to be targeted in San Joaquin County. The District is unable to determine from the EIS/EIR whether land in the District is proposed for these projects. However, the District is concerned that large-scale acquisition of land in the District for these purposes as is proposed in the EIS/EIR would unduly impact the agricultural industry as a whole and the other water users in the District.

The District is opposed to the concept of agricultural land retirement. While

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the document states that land retirement is not for the purpose of acquiring additional water supplies, it does go on to state that the purpose is to meet existing and future water export needs. The concern is that water rights in the guise of land acquisition will be bought up by the CALFED Program and simply reallocated to those who do not have water rights. Current state law requires development to identify a source of water prior to the development being approved by the County or city. If that development does not have a water right or if it cannot identify its source of water, the development should be denied. Land proposed for development which has water rights will not place a new demand for additional water and in fact, may result in using less water. Whereas, land having no water rights create a demand for new, additional water.

The CALFED program also proposes water transfers as an essential element of a long-term solution. SSJID is concerned that those districts which have already invested in conservation efforts be protected. The District has previously commented on this subject and has requested that any new legislation proposed by CALFED not alter those provisions of California law which protect water conservation is a beneficial use and provide that water saved through conservation is not lost and can be transferred.

CALFED has evaluated an isolated canal facility as alternative 3. While the District understands that this proposal will be beneficial in terms of water supply quantity and certainly to export areas, and may reduce the negative impacts to fish caused by the pumping plants, there is the potential of significant detrimental impact to the Delta water supply and in particular will increase salinity in the southern Delta. This disclosure is on page 6.1-12 of the Programmatic EIS/EIR. Because of its potential negative impact on the Delta, including increased salinity, and the potential of even greater uncertainty on the San Joaquin River as a result, the District is opposed to this alternative.

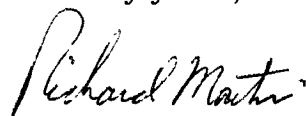
The District is also concerned with inconsistent statements concerning the status of fisheries on the Stanislaus River and flow alternatives and recommendations. SSJID is a signatory to the San Joaquin River Agreement which establishes a flow regime for the next 12 years. No additional flows should be recommended until this study is complete. The Ecosystem Restoration Program Plan seems to recognize as such. On page 399, the ERPP states that "Smolt survival studies have not been completed for the Stanislaus River and the existing data do not indicate that higher flows would improve smolt survival." The District's own fish studies support this conclusion. However, on page 409 the report also

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contains a statement recommending that "Streamflow should be enhanced below Goodwin Dam by providing base flows recommended by the AFRP and a spring flow event in late April or early May in normal and wet years." This recommendation cannot be evaluated in terms of its positive impact on fish as the statement on page 399 recognized. Further, the recommendation of increased flows should not even be considered without analyzing the negative effects of the "vision," including the increased occurrence of high water temperatures in the Stanislaus River in dry years due to reduced storage at New Melones. The California Department of Fish and Game has identified high water temperatures as a major concern in some years in the Stanislaus Rivers. The District suggests that the text cited on Page 409 be deleted and that new language be included which cites the USBR's current interim operating plan for the Stanislaus River.

If you have any questions feel free to call me.

Sincerely yours,



Richard Martin
General Manager



**SOUTH
SAN JOAQUIN
IRRIGATION DISTRICT**

11011 East Highway 120, Manteca, CA 95336-9750

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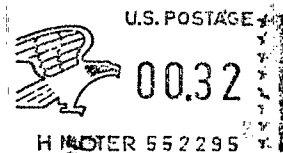
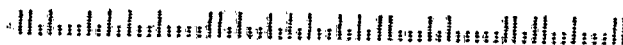
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MANTECA, CA. 95336

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